

## **PLAINTIFF'S MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT**

2. Additionally, Plaintiff has conducted additional discovery since the filing of the Second Amended Complaint, allowing plaintiff to assert some of her claims with more specificity.

3. Plaintiff now seeks to amend her claims to assert additional facts against CMS to support an ICFA claim and to make some of her earlier allegations more specific.

4. Plaintiff has attached a copy of the proposed amended pleading to this motion as an exhibit.

5. Fed. R. Civ. Proc. Rule 15(a)(2) provides that this Court should liberally allow amendment to pleadings.

6. The defendants will not be prejudiced by the filing of the Third Amended Complaint, as the issues and claims asserted in the Third Amended Complaint are already within the scope of the Second Amended Complaint and were already being pursued by the parties in discovery.

WHEREFORE Plaintiff respectfully requests this Court grant her leave to file her Third Amended Complaint.

Respectfully Submitted,

/S/ Lloyd Brooks

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Attorney for Plaintiff

State Bar No. 6271994  
Lloyd Brooks  
The Brooks Law Firm  
15008 Woodlawn Avenue  
Dolton, Illinois 60419  
(708) 841-8000 Telephone  
(708) 841-8080 Facsimile  
E-mail: lloyd.brooks@thebrooksfirm.com  
***Attorney for Plaintiff***